

County of San Diego, Health and Human Services Agency (HHS) CalFresh Program Guide

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Background:

Verification is the use of third-party information or documentation to establish the accuracy of statements on the application. Verification and documentation are tools for making this judgment and recording the decision-making process in the case file.

Policy:

63-117.1 Responsibility for Obtaining Verifications:

The household has primary responsibility for providing verification and to resolve any questionable information.

Households or the Authorized Representative may provide verification in person, through the mail, fax, or email. Any reasonable documentary evidence (verification) provided by the household will be accepted and used to determine how adequately the verification proves the statements on the application.

- If too difficult or impossible for the household to obtain the verification in a timely manner or the household has presented insufficient documentation, offer assistance to the household in obtaining the verification or use a collateral contact or home visit.
 - In this instance, do not require the household to provide further verification.
- Request the household to provide the name of any collateral contact with the exception of information that could be verified through IEVS as specified in [63-118](#). The household may request assistance in designating a collateral contact.
 - If the collateral contact cannot provide accurate third-party verification, it is not required to be used.
 - When the collateral contact designated by the household is unacceptable, ask the household to designate another collateral contact or substitute a home visit.
 - When further verification is necessary, obtain the additional verification from the acceptable collateral contacts.

63-117.2 Receipts:

CalFresh applicants and recipients have the right to be issued a receipt when submitting verifications in the office.

Note: Mailed SAR 7 and other requested documents will not receive a receipt.

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63-117.3 Mandatory Verifications:

Verify the following information prior to certifying a CalFresh household at initial application:

A. Gross Non-Exempt Income:

Determine the amount to be used for certification purposes based on the best available information. When all attempts to verify the income have been unsuccessful because the person or organization providing the income has failed to cooperate, an applicant's affidavit, as a last resort, may be the best available information. ([63-220](#))

B. Noncitizen Eligibility:

Determine if household members identified as noncitizens are eligible noncitizens, as specified in [63-154](#), by requiring the household to present verification of immigration status for each noncitizen applicant.

- Verify the immigration status of only those individuals who are **applying** for CalFresh benefits. A noncitizen may choose to "opt out" and apply only for the other household members.
- Do not verify the immigration status of anyone who is applying for CalFresh on the behalf of others in their household.
- Allow the noncitizen a reasonable opportunity of at least ten days to submit acceptable documentation of their immigration status.
 - If the noncitizen has not done so as of the 30th day following the date of application will not be approved for benefits until acceptable documentation has been submitted.
 - Do not delay the approval of CalFresh benefits for the other household members, if otherwise eligible. Classify that person and/or the household member as an ineligible noncitizen. The prorated share of the income of the excluded noncitizen will be considered available to the CalFresh household as explained in [63-244.2](#).
- Verify the validity of the noncitizen documentation through the United States Citizenship and Immigration Services (USCIS) Systematic Alien Verification for Entitlement (SAVE) system only for the individuals who are applying for CalFresh. The written consent of the noncitizen applicant will not be required as a condition to verify the validity of documentation through SAVE ([Refer to Processing Guide # 117-01](#));

Refer to [63-154.11](#) for information regarding household members unable or unwilling to provide documentation of immigration status.

Immigration Status Documentation:

Noncitizens, lawfully present in the U.S. typically have documents issued by USCIS which contain immigration status information and the date of entry into the country. Some applicants

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may not have documents issued by USCIS, and in some cases the date of entry or adjustment may not be necessary or required.

Until acceptable documentation is provided a noncitizen is ineligible for CalFresh unless a copy of a document provided by the household to USCIS for validation has been submitted. Pending validation, do not deny, delay, reduce or terminate the individual's eligibility for CalFresh on the basis of immigration status. In this situation certify the individual if otherwise eligible pending the results of the investigation for up to six months from the date of original request for verification.

If the noncitizen has no immigration documentation, inform the noncitizen that he or she:

- Is ineligible to receive CalFresh without verification of immigration status and may contact USCIS or otherwise obtain the necessary documentation, or
- May sign a form authorizing the SD County to request verification of immigration status if he/she so wishes.

If a noncitizen gives written consent, contact USCIS (via secondary SAVE) to obtain verification of the noncitizen's status ([Refer to Processing Guide # 117-01](#)). In this situation, certify the individual pending the result of the investigation for up to six months from the date of the original request for verification.

Note: An expired I-551 card is an acceptable form of documentation as lawful permanent residents do not lose their lawful permanent resident status. However, an expired card would represent questionable verification, at certification or recertification. A SAVE verification would need to be requested to clarify the discrepancy. The noncitizen will continue to receive benefits pending response from USCIS if otherwise eligible.

C. Sponsored Noncitizen Information:

The deeming rules apply only to sponsored noncitizens applying for CalFresh whose sponsors have signed an Affidavit of Support (USCIS Form I-864 and/or I-864A) on or after December 19, 1997. Refer to Section [63-157.3](#), Sponsorship Provisions and Indigence and Section 63-157.10, Refusal to Provide Sponsor information.

Obtain from the noncitizen (unless the noncitizen is indigent) the following information at the time of the household's initial application and at recertification:

- The sponsored noncitizen's immigration documentation:
 - The provisions of the Immigration and Nationality Act under which the noncitizen was admitted;
 - The date of the sponsored noncitizen's entry or admission as a lawful permanent resident as established by USCIS;
 - The noncitizen's date of birth, place of birth, and alien registration number.

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- Affidavit of Support ([USCIS Form I-864](#) and/or [I-864A](#)) If an I-551 (Legal Permanent Resident Card) or document containing the USCIS Class of Admission found in the [USCIS Class of Admission Codes \(COA\)](#) has not already been provided;
- The income of the noncitizen's sponsor;
- The names or other identifying factors (such as a noncitizen registration number) of other noncitizens for whom the sponsor has signed an Affidavit of Support (USCIS Form I-864);
- The number of dependents who are claimed or could be claimed as dependents by the sponsor or the sponsor's spouse for federal income tax purposes; and
- The name, address and phone number of the noncitizen's sponsor.

Unless the noncitizen is indigent:

- Verify all other information which has been determined to be questionable and which affects household eligibility and/or benefit level;
- Assist noncitizens in obtaining verification; and
- Use the [SAR 22, Sponsor's Statement of Facts](#) form to obtain the sponsor's information.

[For additional sponsor information, refer to [63-246](#) and [63-157](#)].

D. Identity:

Verify the identity of the person making the application. When an authorized representative applies on behalf of a household, verify the identity of both the authorized representative and the head of household. Identity may be verified through readily available documentary evidence, or if this is unavailable, through a **collateral contact**.

Examples of acceptable documentary evidence the applicant may provide include, but are not limited to:

- A Social Security card or other document containing the Social Security number.
- A driver's license,
- A work or school ID,
- An ID for health benefits or for another assistance program,
- A voter registration card,
- Wage stubs, or
- A birth certificate

Any documents which reasonably establish the applicant's or his/her authorized representative's identity will be accepted, and no requirement for a specific type of document will be imposed.

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E. Social Security Numbers (SSN):

Households must provide the social security number (SSN) of each member or provide verification of application for a SSN prior to certification.

Households adding a newborn can provide the SSN or proof of application for a SSN at the next recertification or within 6 months following the month the baby was born, whichever is later. If the household is unable to provide a SSN or proof of application for a SSN at the next recertification or within 6 months following the baby's birth, whichever is later, then determine if the good cause provisions as explained in CFPG [63-161.7](#) are applicable.

If individuals have more than one SSN, all numbers must be required.

Refer to [63-161](#) for additional social security number information.

F. Residency:

Verification of residency in the County of San Diego will be accomplished to the extent possible using the verification of other information such as, but not limited to: rent or mortgage payments, utility expenses, identity, or as a last resort the client's statement on the SOF.

If verification cannot be accomplished with other information, a collateral contact or other readily available verification can be used. Accept any documents or collateral contact which reasonably establishes the applicant's residency. No requirement for a specific type of verification will be imposed.

In certain unusual cases, such as some migrant farm worker households, homeless households or households newly arrived in the community, verification of residency may be impossible to obtain or may not exist. In such instances, if the applicant, with assistance, has made reasonable efforts to obtain verification and

- Verification cannot be obtained and
- The applicant's statement regarding residency is not questionable, proceed with certification if the household is otherwise eligible. The determination that verification of residency cannot be obtained will be documented in the case.

Verification of residency will be provided by these households prior to their next certification except for homeless households.

Note: Assist homeless applicants or recipients in obtaining adequate documentation/identification. This may be a two-step process, such as assisting the individual in getting a birth certificate so that they can obtain an ID.

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G. Medical Expenses:

Prior to allowing the deduction, verify the amount of any medical expense that is deductible per [63-232](#).

Verification of other factors, such as the eligibility for the deduction, will be required only if questionable.

If obtaining verification of a medical expense may delay the household's certification, the household will be advised that its eligibility and benefit level may be determined without providing a deduction for the claimed but unverified expense.

H. Disability:

Verify disability as defined in [63-1103](#) as follows:

Social Security Disability Benefits:

Proof (award letter) that the disabled individual is receiving Title II Social Security benefits can be accepted as verification. First, attempt to verify the benefits by viewing IEVS reports or MEDS.

Disability Retirement Benefits:

For individuals receiving disability retirement benefits from a governmental agency because of a disability considered permanent under Section 221(i) of the Social Security Act, use the [Social Security Administration \(SSA\) list of permanent disabilities](#).

If it is apparent that the individual has one of the listed disabilities, the household will be considered to have a verified disability.

If the disability is not apparent, the household is required to provide a statement from a physician or licensed/certified psychologist certifying that the individual has one of the disabilities listed.

Disability Related Medi-Cal Assistance:

For individuals receiving disability-based Medi-Cal or individuals pending receipt of SSI, verify through county records that the individual receives disability based Medi-Cal as determined by the State Program Disability Determination Service Division (DDSD). The DDSD determination of disability criteria is as stringent as those used under Title XVI (SSI) of the Social Security Act.

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For individuals receiving disability-related medical assistance under Title XIX, verify through county records that the individual receives disability-related medical assistance under Title XIX (Medi-Cal) of the Social Security Act.

Veteran Related Disabilities:

For a veteran with a service-connected or non-service-connected disability rated by the Veterans' Administration (VA) as total or paid as total by the VA under Title 38 of the United States Code, the household must provide a statement from the VA which indicates that the disabled individual is receiving VA disability benefits.

For a veteran considered by the VA to be in need of regular aid and attendance or permanently housebound under Title 38 of the U.S. Code the household must provide proof that the disabled individual receives VA disability benefits.

For a surviving spouse of a veteran considered by the VA to be in need of regular aid and attendance or permanently housebound or a surviving child of a veteran and considered by the VA to be permanently incapable of self-support under Title 38 of the United States Code, the household must provide proof that the disabled individual receives VA disability benefits.

Railroad Retirement:

For an individual to be considered disabled by the Railroad Retirement, the household shall provide proof that the individual receives a Railroad Retirement disability annuity from the Railroad Retirement Board and qualifies for Medicare.

Disability Verification to Determine Separate Household Status:

To determine if an elderly individual ([63-101.3-E](#)) is unable to purchase and prepare meals separately because of a disability, verify that the individual has a permanent disability by using the [SSA listing of disabilities considered permanent](#).

If it is apparent that the individual is unable to purchase and prepare meals separately because he/she suffers from a severe physical or mental disability even if their disability is not mentioned on the SSA list, he/she shall be considered disabled.

If the disability is not apparent, verify the disability by requiring a statement from a physician or licensed/certified psychologist certifying that the elderly individual is unable to purchase and prepare meals because he/she suffers from:

- A non-apparent disability mentioned in the SSA list;
- Some other severe, permanent physical or mental disease-related disability; or
- A severe and permanent physical or mental non-disease related disability.

Note: The elderly and disabled individual or his/her authorized representative shall be responsible for obtaining the cooperation of the individuals with whom he/she resides in

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providing the necessary income information about the others to the County for purposes of this provision.

Verify disability to establish:

- Classification as a disabled household for Change Reporting (CR).
- Allowance of a deduction for excess medical expenses.
- Separate household status for an elderly individual whose disability prevents him/her from purchasing and preparing meals separately.

I. Child Support Obligation and Actual Payments:

Verify the household's legal obligation to pay child support, the amount of the obligation, and the monthly amount of child support the household actually pays.

Households that fail or refuse to provide the necessary verifications will have their eligibility and benefit level determined without the child support exclusion.

Note: Verify child support or obtain payments information from the Local Child Support Agency (LCSA) automated data files if the data is available. If child support is verified through LCSA, the household does not have to provide additional verification unless questionable. In this case, give the household an opportunity to resolve any discrepancy between household verification and LCSA records and document in CalWIN case comments.

Once the verification is received, the circumstances need not be verified again unless there is a change in the legal obligation or an increase in the amount of the payment.

Refer to [63-224.15](#) for child support payments exclusion information.

63-117.4 Optional Verifications:

California counties have the flexibility of choosing to mandate certain verifications. However, even the non-mandated verifications must be requested if questionable.

San Diego County optional verifications:

A. Dependent Care Costs:

Dependent care costs can be verified through an affidavit on the application or the [Dependent Care Cost Affidavit](#). The household must specify under penalty of perjury on the affidavit:

- The name of the provider,
- The total amount billed,
- The amount of Out-of-pocket expenses, and
- The amount of any subsidies.

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Ask for actual verification (receipts or statement from the provider) when the information provided in the affidavit is questionable. Refer to [Processing Guide # 117-01](#) for a definition of questionable information.

Once verified, the expense will not be requested to be verified again unless:

- The provider has changed, or
- The amount has changed and the change could affect the amount of the deduction, or
- The expense is questionable.

Note: The dependent care deduction should not include any amount that is covered by a subsidy.

Note: Failure to provide verification of dependent care costs must not cause a delay in the determination of eligibility or benefit level calculation.

Refer to [63-233, Dependent Care Deduction](#).

B. Liquid Resources and Loans:

Liquid resources and loans are not to be verified unless:

- Questionable, and/or
- The household receives payments on a recurrent or regular basis from the same source but claims the payments are loans.
 - If the client's verbal agreement to repay a loan is questionable, request a written agreement from the household. A legally binding agreement is not required. A simple statement signed by both parties indicating the payment is a loan that must be repaid, is sufficient for verification.
 - If the payments are recurring, request a statement or affidavit from the provider of the loan stating repayments are being made, or that the payments will be made in accordance with an established repayment schedule.

Note: The resources of Modified Categorical Eligible (MCE) households will not be evaluated. Refer to [63-201](#) and [63-120.7-12](#) for additional information on MCE.

C. Household Size/ Composition:

Household size and composition are not to be verified unless questionable.

Only verify factors affecting the composition of a household when questionable. Refer to [63-101.1](#).

If separate household status is questionable, individuals who claim to be a separate household from those with whom they reside will be responsible for proving that they are a separate household.

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Note: Refer to [63-1104](#) to determine the household composition of household members claiming to be a separate household from those with whom they reside based on disability factors.

D. Shelter Expenses:

Standard Utility Allowance (SUA):

Since the SUA is mandatory for households incurring heating or cooling costs, verification of utilities to allow the SUA is not required unless the information is questionable. Accept the client's statement on the application as verification. Refer to [63-236](#).

Households receiving payments greater than \$20 annually in Low Income Home Energy Assistance Program (LIHEAP) benefits or other similar energy assistance benefits in the current month or in the immediately preceding 12 months qualify for the SUA. Accept the client's statement on the application as verification. Refer to [63-236.3](#)).

Households receiving energy assistance (vendor payments) other than LIHEAP must provide verification of the actual utility expenses and the energy assistance to receive the SUA. Allow the SUA only if the household incurs out-of-pocket expenses for heating or cooling and the amount of the expense exceeds the amount of the assistance ([63-236.5](#)).

Refer to [63-236.6](#) for Standard Utility Assistance Subsidy (SUAS) information.

Rent/Mortgage Expense:

Verify rent/mortgage expenses only at application and if questionable. The verification requirement also applies when the household reports an expense for the first time during the certification period or at recertification.

1. If a household reports an increase of rent or mortgage expense, which is considered questionable, request verification. Do not increase the deduction until the client provides the verification, but **continue to allow the previous verified shelter deduction amount**.
2. If the household moves and reports paying a different amount of shelter cost, do not verify unless questionable and allow the new shelter cost reported by the household.
 - a. If the household has not been paying a shelter expense moves and is now claiming a shelter expense, obtain verification before allowing the deduction.
 - b. If a person sharing the shelter cost (rent, mortgage) expense with the household moves in or out of the home, review the household composition change and contribution to re-determine the deduction. Verification is not required unless questionable.

Note: Do not delay the approval of a CalFresh application or discontinue a CalFresh case because verification of a rent or mortgage expense is not submitted by the household.

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Reminder: Shelter expense changes reported mid-period are considered verified upon receipt (VUR). Change the shelter expense deduction and decrease or increase benefits mid-period unless the change is considered questionable. Refer to [63-284.7.B](#).

E. Citizenship:

When the statement of U. S. citizenship of one or more household member is questionable, the household must provide acceptable verification. Acceptable forms of verification include:

- Birth certificates, religious records,
- Certificates of citizenship N-560 or its replacement N-561 (for
- Acquired/Derivative Citizenship)
- An "Application for Certification of Naturalization" form N-600 for a child or form N-643 for an adopted child provided by USCIS, or
- A U.S. passport.

Participation in the CalWORKs program will be considered acceptable verification if verification of citizenship was obtained for that member(s).

If the above forms of verification cannot be obtained, accept a signed statement from someone who is a U.S. citizen declaring, under penalty of perjury, that the person in question is a U.S. citizen. The signed statement will contain a warning of the penalties for helping someone commit intentional program violation.

The member whose citizenship is in question will be ineligible to participate until proof of U.S. citizenship is obtained and will have his/her income and resources treated in accordance with [63-244.2\(excluded ineligible noncitizen\)](#).

F. Work Registration:

If questionable, verify:

- The household member's work registration exemption due to participation in the CalWORKs welfare to work program and if the household member is subject to and participating in the CalWORKs welfare to work program under Title IV of the Social Security Act, and
- Work registration exemptions because the household member receives or applied for unemployment insurance benefits (UIB). Verify either that the household member:
 - Is receiving UIB, or
 - Has applied for UIB, and
 - Was required to register for work with the Employment Development Department (EDD) as a part of UIB application process. Verify the household member's work registration exemption with the appropriate EDD office.

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If a household member's claim of good cause for voluntary quit, or reduction of work effort is questionable, request verification to support the good cause claim.

If it is difficult for the household to obtain verification in a timely manner, offer assistance to the household to obtain the needed verification.

Acceptable sources of verification include, but are not limited to:

- The previous employer,
- Employee associations,
- Union representatives,
- Grievance committees or organizations.

Whenever documentary evidence cannot be obtained, accept a collateral contact. You are responsible for obtaining verification from acceptable collateral contacts provided by the household.

The household will not be denied CalFresh, they are unable to obtain the requested verification from these or other sources because the reason for the quit was from circumstances that for good reason cannot be verified,

Reasons such as:

- A resignation from employment due to discrimination practices,
- Unreasonable demands by an employer, or
- Because the employer cannot be located;

63-117.5 Sources of Documentation/Verifications:

Use Documentary evidence, collateral contact, or home visits to verify the household's circumstances.

The household will not be required to provide duplicate documentation.

Refer to [Processing Guide # 117-01](#) for more information.

Procedure:

[CalFresh Processing Guide # 117-01](#)

[CalFresh Verification Requirements Chart](#)

[Application Processing Verification Desk Aid](#)

References:

[7 CFR 273](#)

[MPP 300.5](#)

[All County Letter 13-102](#)

[All County Letter 14-54](#)

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[All County Letter 14-66](#)
[All County Letter 14-100](#)

Sunset Date:

This policy will be reviewed for continuance by 02/28/2018.

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